

Arizona PIRG

Education Fund

Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

May 17, 2021

Dear Chairwoman Marquez Peterson and Commissioners,

RE: Docket Number G-00000A-21-0045

On behalf of the Arizona PIRG Education Fund, I write to express our extreme dismay that the Commission would hold a “Stakeholder Meeting and Workshop” on the “... Role of Renewable Natural Gas in Arizona”, yet fail to ensure basic opportunities for varied presentations and ratepayer engagement.

Below please find our general comments:

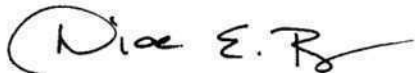
1. Despite the rhetoric from gas utilities, “renewable natural gas” does not exist. The [U.S. Energy Information Administration](#) states “The United States now produces nearly all of the natural gas that it uses”. To us, the words “produces” and “natural” counter what is “renewable” or “natural” and the gas industry, Commission, EIA, and others should immediately stop using this incorrect term.
2. Although as part of the [Southwest Gas rate case](#), the Commission stated its intent to conduct a Workshop on “RNG”, the list of presenters is a dream for the gas industry and a nightmare for consumer and environmental advocates. A number of organizations, including the Arizona PIRG Education Fund, have expressed concerns to the Commission about gas related costs and the direction of the energy portfolio for the regulated utilities in our state. While we understand the topic of the Workshop is a bit more nuanced, to the best of our knowledge, Staff did not seek to include presentations from non-gas funded entities. For future Workshops, we urge the inclusion of those without a vested financial interest be contacted and offered the opportunity to present. Commissioners, Stakeholders, and the public benefit with facts and balanced perspectives.
3. Stakeholders and ratepayers should have knowledge of Commission Workshops at least two weeks in advance. This “Stakeholder Meeting and Workshop” did not get noticed until Thursday, May 13, 2021 – essentially three business days prior to the start of the meeting. The lack of even a “Save the Date” means it is more likely that the gas industry will be very well represented, and advocates and ratepayers will not.

4. Since the “Stakeholder Meeting and Workshop” appears to only allow questions and comments from the public at the end vs. after each speaker, we respectfully request Commissioners seek specific answers from each entity on the following:
 - a. How does the entity define “RNG”?
 - b. What do they see as the potential of “RNG” and in what timeframe (preliminary research points to a lack of meaningful contributions until after 2030)?
 - c. What does the entity see as the costs and benefits of “RNG”?
 - d. What are the estimated greenhouse gas emission savings from “RNG” (preliminary research states the savings are questionable)?
 - e. What are the specific impacts for Arizona ratepayers?

Please note that generally speaking, we do not oppose efforts of capturing and using methane from sources such as landfills and wastewater treatment, as long as gas is being produced without active intervention and ratepayers benefit. We do not support more resource-intensive efforts to create “RNG”, such as through gasification. Further, we do not support large-scale infrastructure decisions that create a barrier to clean energy and electrification.

Thank you for your consideration of our comments. I can be reached at dbrown@arizonapirg.org or (602)318-2779 (c) with any questions.

Sincerely,



Diane E. Brown
Executive Director

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